

## State Water Resources Control Board

April 9, 2019

(Via email and Certified Mail)

**CERTIFIED MAIL**  
**NO. 7017 2680 0000 6289 4749**

Mr. Brandon Reeves  
Safety Manager  
Fresno Irrigation District  
2907 South Maple Avenue  
Fresno, California 93706  
[breeves@fresnoirrigation.com](mailto:breeves@fresnoirrigation.com)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM  
LOCATED AT FRESNO IRRIGATION DISTRICT, 2907 SOUTH MAPLE  
AVENUE, FRESNO**

Dear Mr. Reeves:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on March 28, 2019, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Operating Permit Onsite</b> – A valid operating permit was not available at the time of inspection.	43991	March 28, 2019	Ongoing	H&SC 25284(a); 23 CCR 2712(i)
2	<b>Failure to Update Facility Information</b> – The facility information form does not list the new manager.	43991	March 28, 2019	Ongoing	H&SC 25286(a) or (c); 23 CCR 2711(a) & (d)
3	<b>Failure to Update Tank Information</b> – The tank information form does not list the new manager. Additionally, the vacuum sensor model number is not listed. Please verify that the vacuum sensor is compatible with the Incon monitoring panel.	43991	March 28, 2019	Ongoing	H&SC 25286(a) or (c); 23 CCR 2711(a) & (d)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	<b>Failure to Update Monitoring Plan</b> – The monitoring plan form does not list the new manager.	43991	March 28, 2019	Ongoing	H&SC 25286(a) & (c); 23 CCR 2711(a)(9)
5	<b>Failure to Update Response Plan</b> – The response plan form does not list the new manager.	43991	March 28, 2019	Ongoing	23 CCR 2632(d)(2)
6	<b>Failure to Perform Overfill Prevention Equipment Inspection</b> – The document for the overfill prevention equipment inspection was not filled out correctly because sections 3 and 4 were left blank on the January 11, 2019 testing document.	43991	January 11, 2019	Ongoing	23 CCR 2637.2(a)(1)
7	<b>Failure to Maintain Secondary Containment</b> – The product piping failed the tightness test, the Under Dispenser Containment (UDC) failed, and the sump for the vapor pot was not tested during the secondary containment testing on December 7, 2018.	43991	December 7, 2018	Ongoing	H&SC 25291(a)(2)
8	<b>Failure to Perform Certification of Monitoring Equipment</b> – The January 11, 2019 monitoring certification test did not include testing information for the Relay System.	43991	January 11, 2019	Ongoing	23 CCR 2638
9	<b>Failure to Submit Plot Plan/Site Map</b> – The UST site map including appropriate content and level of detail was not available at the time of inspection.	43991	March 28, 2019	Ongoing	23 CCR 2632(d)(1)(C), 2711(a)(8)
10	<b>Failure to Monitor Product Piping</b> – Sensors in turbine, piping, and transition sumps are unable to detect a leak at the earliest opportunity because they are not in a true vertical position at the lowest point in the sump. Additionally, the Incon monitoring panel is in alarm.	43991	March 28, 2019	Ongoing	23 CCR 2630(d)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Fresno County Environmental Health Division within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.**

Please send all compliance documentation to the following:

**State Water Board**

Ms. Rebecca Green  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
[rebecca.green@waterboards.ca.gov](mailto:rebecca.green@waterboards.ca.gov)

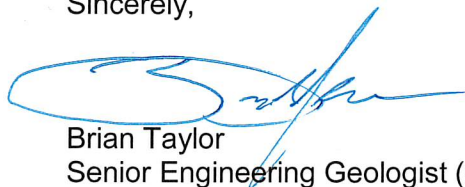
**Local CUPA**

Mr. Vincent Mendes  
Supervising Environmental Health Specialist  
Fresno County Environmental Health Division  
200 W. Pontiac Way, Building 3  
Clovis, California 93612  
[vmendes@co.fresno.ca.us](mailto:vmendes@co.fresno.ca.us)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 323-0600, or by email at [brian.taylor@waterboards.ca.gov](mailto:brian.taylor@waterboards.ca.gov).

Sincerely,



Brian Taylor  
Senior Engineering Geologist (Supv.)  
UST Enforcement Unit  
**Office of Enforcement**

cc: *(via email only)*

Mr. Vincent Mendes  
Supervising Environmental Health Specialist  
Fresno County Environmental Health Division  
[vmendes@co.fresno.ca.us](mailto:vmendes@co.fresno.ca.us)

Mr. Harry Yee  
Supervising Environmental Health Specialist  
Fresno County Environmental Health Division  
[hyee@co.fresno.ca.us](mailto:hyee@co.fresno.ca.us)